



August 11, 2010

**Sent via email**

David Duster  
U.S. Environmental Protection Agency  
Region 8, 8ENF-T  
999 18<sup>th</sup> Street, Suite 300  
Denver, Colorado 80202-2466

RE: Progress report for July activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear David:

Per paragraph 64 of the Order, enclosed is a copy of the referenced progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4112 or e-mail at [pglader@hecla-mining.com](mailto:pglader@hecla-mining.com).

Sincerely,

A handwritten signature in black ink, appearing to read "P. Glader", written over a horizontal line.

Paul L. Glader  
Manager Environmental Services

Encl

Cc: HMC Legal Dept (w/o attachments)



August 11, 2010

**Sent via U.S. Mail**

Charlotte Lomeli, Chairman.  
Shivwits Band of Paiute Indian Tribe  
6060 West 3650 North  
Ivins, Utah 84738

John Krause  
Bureau of Indian Affairs  
400 North 5<sup>th</sup> Street, Floor 12  
Phoenix, AZ 85004

Kelly Youngbear  
BIA Southern Paiute Agency  
P.O. Box 720  
St. George, UT 84771

RE: Progress report for July 2010 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Chairman Lomeli, Mr. Krause and Ms. Youngbear:

Per paragraph 64 of the Order, enclosed is a copy of the referenced progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4112 or e-mail at [pglader@hecla-mining.com](mailto:pglader@hecla-mining.com).

Sincerely,

A handwritten signature in black ink, appearing to read "P. Glader", written over a horizontal line.

Paul L. Glader  
Manager Environmental Services

Encl

Cc: HMC Legal Dept. (w/o attachments)  
David Duster (USEPA, Region VIII) (w/o attachments)



August 11, 2010

**MEMORANDUM TO:** Apex File

**COPIES TO:** distribution

**FROM:** Paul Glader

**SUBJECT:** **Progress Report No. 75 for period ending July 31, 2010;  
Pond 2 Final Closure - Apex Site, Washington County, Utah**

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**Summary**

The monthly visual inspection, per the long term monitoring plan, was conducted on July 19. No unusual conditions were noted.

**Geotechnical Monitoring**

Based on the data showing that the facility has experienced consistently low settlement rates over the past three years, Hecla will continue to monitor the facility, however with survey data being collected on an annual basis.

The settlement monitors were surveyed on August 17, 2009. No appreciable movement was noted. MEI prepared a Surface Monument Survey Data Review. Based on surface monitoring survey data collected from January 2006 through August 2009:

- Overall settlement of the reclaimed impoundment top surface continues to be very minor
- Settlement rates continue to slightly decrease
- Monitoring survey will be conducted in August or September

**Work Planned for Next Period**

Visual inspection of site

**Cost and Schedule**

Committed costs in July 2010 were \$168. Total project to date committed cost is approximately \$1,477,000.

**Supplemental Attachments**

July 2010 site inspection report

July 2010 cost report

# Annual Site Inspection Summary Sheet - Apex Site - Pond 2

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

## Form 1 of 4 - Summary

Date: <u>7-15-10</u>			
Inspector: <u>D. Runnels</u>			
Cover System Component	Potential Problem		Limits Potentially Exceeded
Site Perimeter	Erosion or Fencing Issues		NA
Cover System (outslopes, top, rock)	Subsidence		Minor: ponding < 1" some gullying / erosion Yes <input checked="" type="checkbox"/> * No <input type="checkbox"/>
			Significant: see Table 2 Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Embankment Slope Stability		excessive movement or surface cracks > than 1" Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Gullying	on top	depth > 1" Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		at embankment crest or on outslope	depth > 2" Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		w/in normal flow channel in diversion channel	no gullying allowed Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		w/in diversions at toe of impoundment outslope	no gullying allowed Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		in diversion channel at any other location	NA NA
	Erosion Protection Stability		rock subsiding or missing Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Seepage		no colored seepage allowed (red, blue, yellow w/ crystallization) Yes <input type="checkbox"/> * * No <input checked="" type="checkbox"/>
Runoff Control System	Diversion Channel	rock in place, channel not moving, fence stable Yes <input checked="" type="checkbox"/> * No <input type="checkbox"/>	
	Diversion Swales	rock in place, no silting in or head cutting Yes <input checked="" type="checkbox"/> * No <input type="checkbox"/>	
	Excessive silt build up at fence lines in diversion channel	allowed if not effecting cover system Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>	

\* Mark all areas of concern or requiring repairs on attached site map.

**Annual Site Inspection - Apex Site - Pond 2**

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

**Form 2 of 4 - Site Perimeter**

Inspection Date: <u>7-19-10</u>	
Inspector: <u>J. P. [Signature]</u>	
<b>Visible Outlying Areas</b>	
Observed Condition:	<u>No Change</u>
Observed Damage:	<u>None</u>
May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>	
<b>Property Boundary Fence and Gate (walk fence line)</b>	
Observed Condition:	<u>Fence &amp; Gate Remain O.K.</u>
Observed Damage:	<u>None</u>
Potential Corrective Actions:	<u>None</u>
May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>	
<b>All Upgradient Areas (areas that drain onto property)</b>	
Observed Condition:	<u>No Change</u>
Observed Damage:	<u>None</u>
May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>	

\* Mark all areas of concern or requiring repairs on attached site map.

**Annual Site Inspection - Apex Site - Pond 2**

**Hecla Mining Company - Long-Term Maintenance and Monitoring Plan**

**Form 3 of 4 - Impoundment**

Inspection Date: <u>7-19-10</u> Inspector: <u>D. [Signature]</u>			
<b>Outslopes</b>			
Observed Performance:	Rock Cover Subsidence:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Excessive Slope Movement (failure):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Gully Development:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Observable Leachate (colored):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Excessive Siltation (at slope toe):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
Observed Damage: <u>NONE</u>			
Potential Corrective Actions: <u>NONE</u>			
<b>Top (top surface soils)</b>			
Observed Performance:	Cracking (>1" width):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Settlement / Evidence of Ponding:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Erosion / Gullying:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
Observed Damage: <u>NONE</u>			
Potential Corrective Actions: <u>NONE</u>			
<b>Erosion Protection Layer (rock)</b>			
Observed Performance:	Rock Staying in Place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Rock Subsiding:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Missing Rock:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
Observed Damage: <u>NONE</u>			
Potential Corrective Actions: <u>NONE</u>			

\* Mark all areas of concern or requiring repairs on attached site map.

**Annual Site Inspection - Apex Site - Pond 2**

**Hecla Mining Company - Long-Term Maintenance and Monitoring Plan**

**Form 4 of 4 - Diversion Channel and Swales**

Date: <u>7-19-10</u>			
Inspector: <u>D. Tamm</u>			
<b>Diversion Channel</b>			
Observed Performance:	Erosion Protection in place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Normal Flow Channel in place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Encroaching on Site Fencing:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
Observed Damage:	<u>None</u>		
Potential Corrective Actions:	<u>None</u>		
<b>Diversion Swales</b>			
Observed Performance:	Erosion Protection in place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Flow Channel Silting In:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Head Cutting:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
Observed Damage:	<u>None</u>		
Potential Corrective Actions:	<u>None</u>		

\* Mark all areas of concern or requiring repairs on attached site map.

Activity	2004 Budget	Revised Budget May 2004	Committed Cost this Period	Cumulative Committed Cost To Date 7-31-10	Forecasted Cost To Complete	Forecasted Final Cost	Remarks on Forecast to Complete
<b>Phases I through III (Completed February 2006)</b>							
Phase I - Drain Excess Liquid From Tailings	189,200	72,700		67,928	0	67,928	
Phases II, IIA + IIB - Evaporate Excess Liquid	6,000	8,000		242,882	0	242,882	
Phase III - Regrading & Final Cover System	337,000	342,050		504,742	0	504,742	
Field Indirect Costs	164,500	213,568		378,517	0	378,517	Includes Jan + Feb 2006 long term monitoring costs
Hedra Costs	18,700	18,700	0	33,324	0	33,324	
<b>Subtotal Phases I through III</b>	<b>715,400</b>	<b>655,018</b>	<b>0</b>	<b>1,227,393</b>	<b>0</b>	<b>1,227,393</b>	
<b>Long Term Monitoring (through FY 2010)</b>							
Site Inspections			168	191,367	3,346	194,713	
Settlement Monitoring				8,775	1,650	10,425	
Consultant Support:							
Annual Geotechnical Engineer Inspections				2,495	18,100	20,595	Includes settlement monitoring data analysis
Vegetation Monitoring			0	0	20,000	20,000	Allowance for surveys in FY 2008 - 2010
Site Conditions Review - MEI			0	7,669	2,132	9,801	
Site Conditions Review - SVL Analytical			0	2,079		2,079	
Erosion Repair Review - MEI				2,927	573	3,500	
Revegetation Review - Bamberg					3,500	3,500	
<b>Maintenance:</b>							
Erosion Repair Allowance							
Revegetation Allowance				21,941	7,500	29,441	Erosion repair conducted April 2008
				9,912	10,000	19,912	Revegetation conducted April 2008
<b>Hedra Project Management Costs:</b>							
Labor			0	2,266	7,909	10,175	
Travel expenses			0	0	1,312	1,312	
<b>Subtotal Long Term Monitoring</b>	<b>0</b>	<b>0</b>	<b>168</b>	<b>249,431</b>	<b>76,022</b>	<b>325,453</b>	
<b>Total Pond 2 Final Closure</b>	<b>715,400</b>	<b>655,018</b>	<b>168</b>	<b>1,476,824</b>	<b>76,022</b>	<b>1,552,846</b>	